

**BAILEY ♦ KENNEDY**  
8984 SPANISH RIDGE AVENUE  
LAS VEGAS, NEVADA 89148-1302  
702.562.8820

JOHN R. BAILEY  
Nevada Bar No. 0137  
JOSHUA M. DICKEY  
Nevada Bar No. 6621  
**BAILEY ♦ KENNEDY**  
8984 Spanish Ridge Avenue  
Las Vegas, Nevada 89148-1302  
Telephone: 702.562.8820  
Facsimile: 702.562.8821  
JBailey@BaileyKennedy.com  
JDickey@BaileyKennedy.com

ANDREW J. ENNIS  
Missouri Bar No. 57713  
(ADMITTED PRO HAC VICE)  
**POLSINELLI PC**  
900 W. 48<sup>th</sup> Place, Suite 900  
Kansas City, Missouri 64112  
Telephone: 816.753.1000  
Facsimile: 816.753.1536  
AEnnis@Polsinelli.com

*Attorneys for Defendant Dignity Health*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

ALLISON R. VECE, individually; KEVIN H.  
PHELPS, individually; and GAYLE FEDELE,  
individually,

Plaintiffs,

vs.

DOE Special Administrator of the Estate of  
JOSEPH W. PLAUTZ, deceased; DESERET  
WOMEN'S HEALTH CARE MANAGEMENT,  
LLC d/b/a DESERET WOMEN'S CARE;  
DIGNITY HEALTH f/k/a ST. ROSE DE LIMA  
HOSPITAL; ROE MEDICAL FACILITIES;  
DOES 1 through 10; ROE CORPORATIONS 13  
through 20; and ABC LIMITED LIABILITY  
COMPANIES 21 through 30,

Defendants.

Case No.: 2:24-cv-01025-GMN-EJY

**STIPULATION AND ORDER TO EXTEND  
DEFENDANT DIGNITY HEALTH'S  
TIME TO RESPOND TO PLAINTIFFS'  
MOTION TO REMAND (ECF No. 12)**

**(THIRD REQUEST)**

1 Defendant Dignity Health f/k/a St. Rose De Lima Hospital (“Dignity Health”) and Plaintiffs  
2 Allison R. Vece; Kevin H. Phelps; and Gayle Fedele (“Plaintiffs”) (collectively, the “Parties”)  
3 hereby stipulate as follows:

4 1. Plaintiffs’ Motion to Remand (“Motion”) in this action was filed on June 24, 2024  
5 (ECF No. 12).

6 2. Dignity Health’s current deadline to respond to the Motion is July 26, 2024.

7 3. Plaintiffs’ Petition to Reopen the Estate of Joseph Wheeler Plautz (“Petition”) was  
8 filed on March 21, 2024, in the Eighth Judicial District Court (Case No. P-16-087171-E) (“State  
9 Court”).

10 4. The Parties previously stipulated, and the Court ordered, that the deadline to respond  
11 to the Motion be extend from July 8, 2024 to July 26, 2024 (the “First Extension”).

12 5. Subsequently, the Parties stipulated, and the Court ordered, that the deadline to  
13 respond to the Motion be extend from July 26, 2024 to August 16, 2024 (the “Second Extension”).

14 6. The basis for the First Extension and Second Extension was that the decision by the  
15 State Court on the Petition is relevant to the Motion, and it would serve the interests of efficiency  
16 and judicial economy to extend the date for Dignity Health to respond to the Motion until after an  
17 order is entered on the Petition.

18 7. The hearing on the Petition was recently reset for hearing from August 8, 2024, at  
19 9:00 a.m. to August 29, 2024, at 9:30 a.m.

20 8. Given that the Petition is relevant to the Motion, and that it would serve the interests  
21 of efficiency and judicial economy to extend the date for Dignity Health to respond to the Motion  
22 until after an order is entered on the Petition, the Parties stipulate and agree to extend the deadline  
23 for Dignity Health to file its response to the Motion from August 16, 2024, to September 6, 2024.

24 9. This is Dignity Health’s third requested extension. This stipulation is consistent with  
25 the First Extension and Second Extension, and is made in good faith and not to delay the  
26 proceedings.

1           10.     This stipulation is entered into without waiver of any of the parties' respective rights,  
2 claims, or defenses.

3     Dated this 16<sup>th</sup> day of August, 2024.

Dated this 16<sup>th</sup> day of August, 2024.

4     **BAILEY ♦ KENNEDY**

**CHRISTIAN MORRIS TRIAL ATTORNEYS**

5     By: /s/ Joshua M. Dickey

By: /s/ Victoria R. Allen

6     JOHN R. BAILEY  
7     JOSHUA M. DICKEY  
8     8984 Spanish Ridge Avenue  
9     Las Vegas, Nevada 89148-1302

CHRISTIAN M. MORRIS (NV BAR No. 11218)  
VICTORIA R. ALLEN (NV BAR No. 15005)  
JAMIE N. MCINELLY (NV BAR No. 15963)  
SARAH E. DISALVO (NV BAR No. 16398)

8     ANDREW J. ENNIS  
9     (ADMITTED PRO HAC VICE)  
10    **POLSINELLI PC**  
11    900 W. 48<sup>th</sup> Place, Suite 900  
12    Kansas City, Missouri 64112

*Attorneys for Plaintiffs Allison R. Vece; Kevin H. Phelps;  
and Gayle Fedele*

11    *Attorneys for Defendant Dignity  
12    Health*

13                   **IT IS SO ORDERED:**

14                     
15                   UNITED STATES MAGISTRATE JUDGE  
16

17                   Date: August 16, 2024  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28